

BEXAR METRO

9-1-1 Network District

September 19, 2013

Mr. David Furth, Deputy Bureau Chief
Public Safety and Homeland Security Bureau
Federal Communications Commission
445 12th Street SW
Washington, DC 20554

Dear Mr. Furth:

As a follow-up to our conference call on August 15th, the Bexar Metro 9-1-1 Network District (Bexar Metro) submits the following response in support of the Federal Communications Commission (FCC) inquiry regarding our recent experience with delivery and accuracy of Phase 2 wireless 9-1-1 calls received at Bexar Metro PSAPs:

Bexar Metro is satisfied that all wireless carriers within our area of responsibility are meeting or exceeding the minimum Phase 2 accuracy requirements set by the FCC.

Bexar Metro is a special purpose emergency communication district that provides 9-1-1 services to twenty-five PSAPs that serve thirty-seven jurisdictions located throughout Bexar, Guadalupe and Comal counties in the San Antonio Metropolitan Statistical Area. In 2004, Bexar Metro implemented a Wireless Quality Assurance/Quality Control testing program to test the performance and accuracy of all wireless carriers. The program averages 1,100 test calls per year using a combination of United States Geological Survey (USGS) survey monuments, Texas Department of Transportation (TxDOT) geodetic survey markers, and a survey-grade Global Positioning System (GPS) to establish ground truth. The data collected confirms there is no degradation of Phase 2 accuracy within the Bexar Metro service area or with a carrier's ability to provide Phase 2 location data upon receipt of a manual rebid request from the PSAP.

Attached is the ECaTs aggregated call data you requested. It summarizes Phase 2 information for all wireless 9-1-1 calls initiated within our area of responsibility for the period January 2012 through August 2013 by Month and Year and by total calls by Class of Service. It is important to note the following:

- The ECaTs data simply indicates whether the calls were handled as wireless Phase 1 or wireless Phase 2; and because ECaTs data is collected at call termination, it does not indicate whether wireless carriers could not or would not have Phase 2 location data available on rebid by the PSAP.
- As with federal law, the Texas Health and Safety Code Annotated Section 771.061 provides that individual information a wireless service provider is required to furnish to a governmental entity is confidential. However, we agree that aggregate data simply indicating the percentage of calls where there may or may not have been a wireless Phase 2 rebid should not involve confidentiality restrictions any more than standard practice of reporting the aggregate number of wireless 9-1-1 calls per year would implicate such confidentiality restrictions.

If you have any questions or need additional data, please do not hesitate to contact us.

Sincerely,



W. H. Buchholtz
Executive Director

Enclosure



Bexar Metro 9-1-1 Network District

Notes on data sources:

Wireless Calls by Class of Service (By Month and Year) -- Figure 1

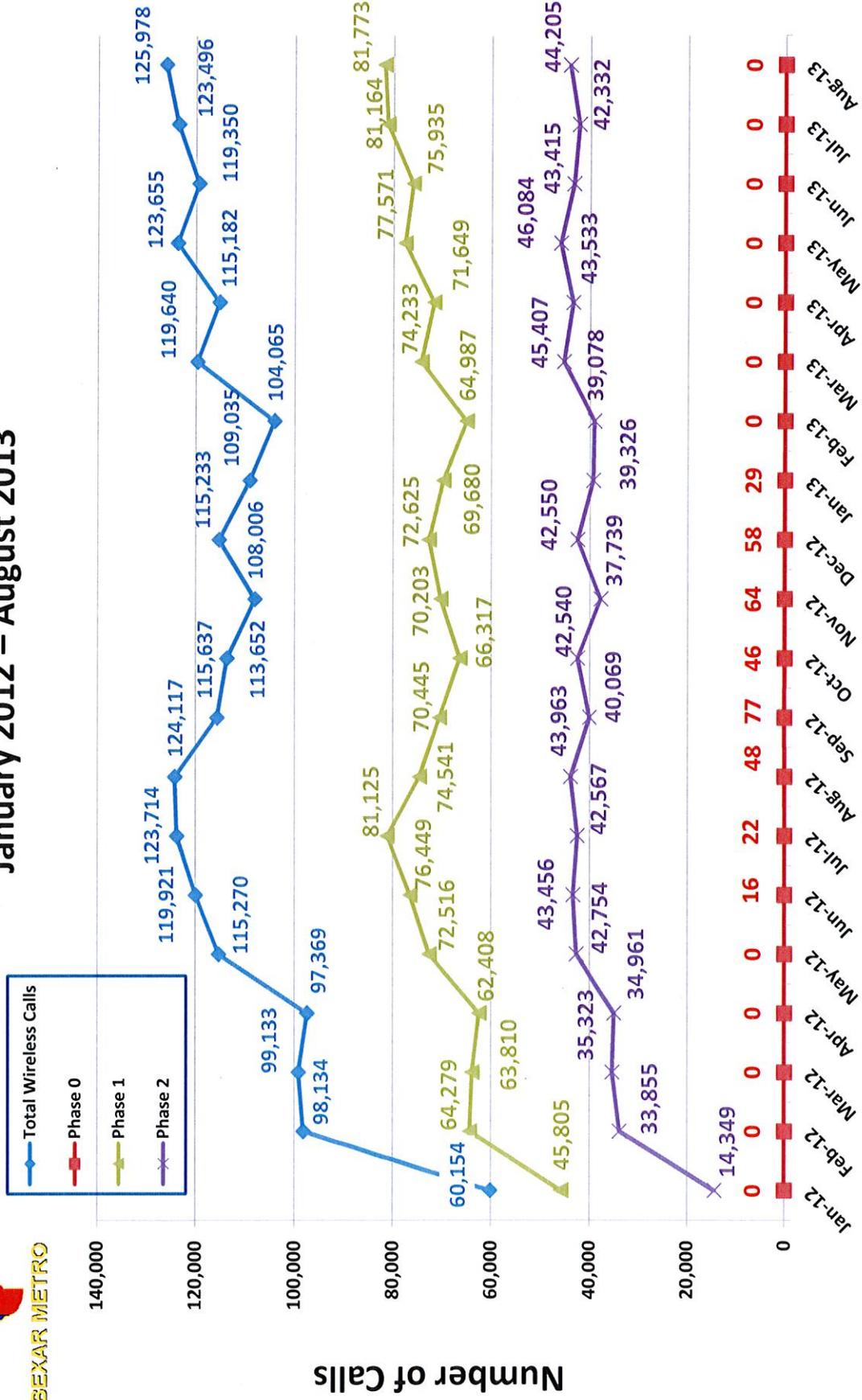
The wireless class of service data in Figure 1 was compiled by Bexar Metro 9-1-1 Network District using the ECaTs data collection tool and depicts the class of service at the *end of each call*. The data spans January 2012 to August 2013. The **y** axis of the graph represents the number of calls over a specified time and includes calls from all District PSAPs/all wireless carriers. On the **x** axis, the month and year displayed. There are four wireless call types displayed for comparison (Total Wireless Calls followed by Phase 0, Phase 1, Phase 2 classes of service calls).

Wireless Calls by Class of Service (Cumulative) -- Figure 2

The wireless class of service data in Figure 2 was also compiled by Bexar Metro 9-1-1 Network District using the ECaTs data collection tool. This data also spans January 2012 to August 2013. The **y** axis of the graph represents the number of calls over that entire period of time. The **x** axis displays each wireless class of service for all District PSAPs and all carriers in our area of responsibility.



Bexar Metro 9-1-1 Network District Wireless Calls by Class of Service January 2012 – August 2013

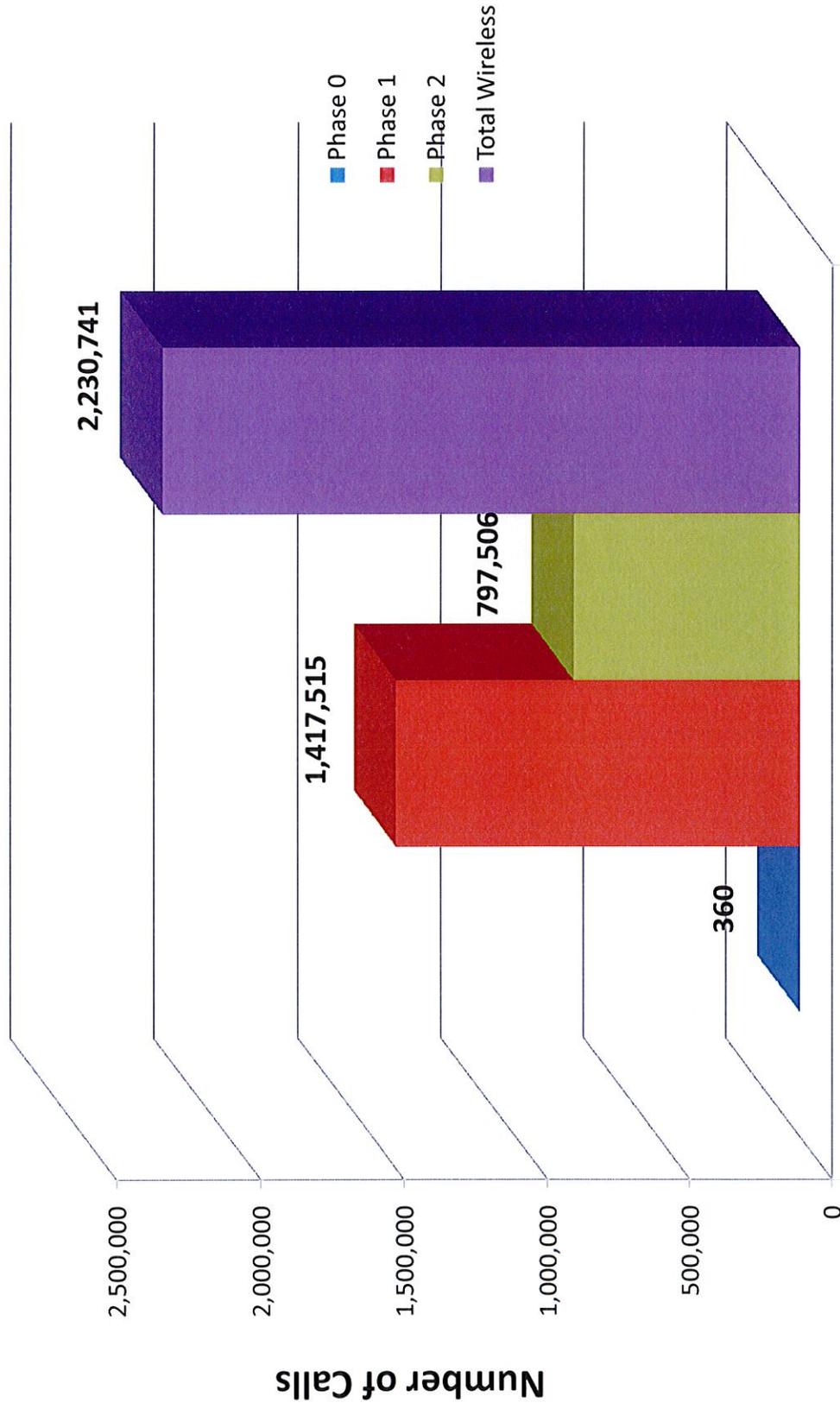


Month and Year

BM Figure 1



Bexar Metro 9-1-1 Network District Wireless Calls by Class of Service Cumulative January 2012 – August 2013



Wireless by Class of Service--Totals